

**GREENBAUM, ROWE, SMITH & DAVIS LLP**

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Attorneys for Defendant Thomas D. Halket

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

KIMBERLEE WILLIAMS, et al.,

Plaintiffs,

v.

BASF CATALYSTS LLC, et al.,

Defendants.

Civil Action No. 2:11-cv-1754 (JLL-JAD)

**NOTICE OF MOTION TO DISMISS  
SECOND AMENDED COMPLAINT  
PURSUANT TO FED. R. CIV. P. 12(b)(6)**

**ORAL ARGUMENT REQUESTED**

**TO:** Christopher M. Placitella, Esq.  
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Attorneys for Plaintiffs

Jeffrey M. Pollock, Esq.  
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Attorneys for Plaintiffs

**COUNSEL:**


**PLEASE TAKE NOTICE** that on a date to be determined by the Court, defendant Thomas D. Halket ("Defendant"), by and through his counsel, Greenbaum, Rowe, Smith & Davis LLP, shall move before the Honorable Jose L. Linares, U.S.D.J., at the United States District Court, Martin Luther King, Jr. Federal Building and U.S. Courthouse, in Newark, New Jersey, for an Order dismissing the Plaintiffs' Second Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(6).

**PLEASE TAKE FURTHER NOTICE** that in support of the within application, the Defendant shall rely upon the Memorandum of Law and the Declaration of Thomas D. Halket, submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a Certification of Service and a proposed form of Order are submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that oral argument is hereby requested.

**GREENBAUM, ROWE, SMITH & DAVIS LLP**  
Attorneys for Defendant Thomas D. Halket

By: 

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ERIC TUNIS

Dated: September 25, 2015